

**FILED**

May 26, 2021

CLERK, U S DISTRICT COURT  
WESTERN DISTRICT OF TEXASBY: SAJ  
DEPUTYUNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION

UNITED STATES OF AMERICA	§	CAUSE NO.: <b>DR-21-CR-00849-AM</b>
	§	
	§	<b><u>INDICTMENT</u></b>
v.	§	
	§	[VIO: COUNT ONE: 8 U.S.C. §
JUAN LUIS MONGE-CHACHAGUA	§	1324(a)(1)(A)(v)(I) & (B)(i) Conspiracy
	§	to Transport Illegal Aliens.]
	§	

**FORFEITURE**

THE GRAND JURY CHARGES:

COUNT ONE  
 [8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i)]

On or about May 8, 2021, in the Western District of Texas, Defendant,

JUAN LUIS MONGE-CHACHAGUA,

did knowingly and intentionally combine, conspire, confederate and agree with others known and unknown, to commit the following offense against the United States: to transport and move, and attempt to transport and move, by means of transportation or otherwise, aliens who entered and remained in the United States in violation of law, knowing and in reckless disregard of the fact said aliens came to, entered, and remained in the United States in violation of law, and in furtherance of such violation of law, in violation of Title 8, United States Code, Section 1324(a)(1)(A)(v)(I) and (B)(i).

**NOTICE OF UNITED STATES OF AMERICA'S DEMAND FOR FORFEITURE**  
 [See FED. R. CRIM. P. 32.2]

**I.**

**Immigration Violations and Forfeiture Statute**

**[Title 8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i),  
subject to forfeiture pursuant to Title 18 U.S.C. § 982(a)(6)]**

As a result of the foregoing criminal violations set forth in Count One, the United States gives notice to the Defendants of its intent to seek the forfeiture of property upon conviction and as a part of sentence pursuant to FED. R. CRIM. P. 32.2 and Title 18 U.S.C. § 982(a)(6) which states the following:

**Title 18 U.S.C. § 982 Criminal forfeiture**

**(a)(6)(A)** The court, in imposing sentence on a person convicted of a violation of, or conspiracy to violate, section 274(a) . . . of the Immigration and Nationality Act . . . shall order that the person forfeit to the United States, regardless of any provision of State law—

- (i)** any conveyance, including any vessel, vehicle, or aircraft used in the commission of the offense of which the person is convicted; and
- (ii)** any property real or personal—
  - (I)** that constitutes, or is derived from or is traceable to the proceeds obtained directly or indirectly from the commission of the offense of which the person is convicted; or
  - (II)** that is used to facilitate, or is intended to be used to facilitate, the commission of the offense of which the person is convicted.

This Notice of Demand for Forfeiture includes but is not limited to the property described below:

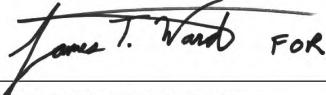
- 1. Remington 1911 pistol, s/n: RHH025447; and**
- 2. Any related ammunition and firearm accessories, including:**
  - A. 1 .45 caliber magazine; and**
  - B. 3 .45 caliber rounds of Winchester ammunition.**

A TRUE BILL

FOREPERSON

ASHLEY C. HOFF

United States Attorney

By:  James T. Ward FOR

JESSE M. ESHKOL

Assistant United States Attorney

SEALED:  
UNSEALED: XX

**PERSONAL DATA SHEET  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
DEL RIO DIVISION**

COUNTY: KINNEY USAO #: 2021R02865

DATE: MAY 26, 2021 MAG. CT. #: DR21-00847M

AUSA: JESSE M. ESHKOL

DEFENDANT: JUAN LUIS MONGE-CHACHAGUA

CITIZENSHIP: UNITED STATES

INTERPRETER NEEDED: NO

DEFENSE ATTORNEY: SOSTENES MIRELES , II

ADDRESS OF ATTORNEY: PO BOX 1364, DEL RIO, TX 78841

DEFENDANT IS: DETAINED DATE OF ARREST: MAY 8, 2021

BENCH WARRANT NEEDED: NO

PROBATION OFFICER: N/A

NAME AND ADDRESS OF SURETY: N/A

YOUTH CORRECTIONS ACT APPLICABLE: NO

PROSECUTION BY: INDICTMENT

OFFENSE: (Code & Description): Count 1: 8 U.S.C. § 1324(a)(1)(A)(v)(I) & (B)(i) - Conspiracy to Transport Illegal Aliens.

OFFENSE IS: FELONY

MAXIMUM SENTENCE: For each count - 10 years' imprisonment; up to \$250,000 fine; up to 3 years of supervised release; \$100 mandatory special assessment; \$5,000 special assessment non-indigent for each count of conviction.

PENALTY IS MANDATORY: YES & NO

REMARKS: See above

W/DT-CR-3